

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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INDEPENDENT ASSET MANAGEMENT LLC)	Case No. 1:07-cv-06431-JSR
and OLA HOLMSTROM,)	
)	
Plaintiffs,)	ECF
)	
vs.)	
)	
)	
DANIEL ZANGER,)	DEFENDANT'S NOTICE OF
)	MOTION FOR PARTIAL SUMMARY
Defendant.)	JUDGMENT
)	
)	
-----	X	

PLEASE TAKE NOTICE that upon the accompanying Declarations of Daniel Zanger and Michael D. Silberfarb, sworn to on April 28, 2008, the exhibits annexed thereto, the accompanying Memorandum of Law in Support of Defendant's Cross Motion for Partial Summary Judgment, and upon all the prior proceedings and matters of record in this case, Defendant will move the Court before the Honorable Jed S. Rakoff, United States District Court Judge for the Southern District of New York for partial summary judgment pursuant to Federal Rule of Civil Procedure 56; and for such other and further relief as the Court deems just and proper.

Plaintiff Independent Asset Management LLC shall serve Opposing Papers on or before May 9, 2008 or at such time as the Court shall deem appropriate.

Dated: April 28, 2008

Respectfully submitted,

s/ Matthew E. Szwajkowski

Thomas H. Sear (TS-5570)

Matthew E. Szwajkowski (MS-8362)

Michael D. Silberfarb (MS-9678)

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CERTIFICATE OF SERVICE

The foregoing document was served on the following counsel of record on September 14, 2007 via the method listed below:

E-Mail, Federal Express, and Hand Delivery

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s/ Matthew E. Szwajkowski